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O'Connell, Musion Events Ltd., and Musion 3D Ltd.

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

HOLOGRAM USA, INC., a Delaware corporation;)	
MUSION DAS HOLOGRAM LIMITED, a)	Case No. 2:14-cv-0772-GMN-NJK
corporation organized under the laws of the United)	
Kingdom; and UWE MAASS, an individual,)	
	DECLARATION OF IAN
Plaintiffs,	CHRISTOPHER O'CONNELL
	IN SUPPORT OF DEFENDANTS'
v.	MOTION TO DISMISS FOR LACK
	OF PERSONAL JURISDICTION
	AND/OR IMPROPER VENUE
PULSE EVOLUTION CORPORATION, a Nevada)	
Corporation; PULSE ENTERTAINMENT)	
CORPORATION, a Delaware corporation, JOHN)	
C. TEXTOR, an individual; DICK CLARK)	
PRODUCTIONS, INC., a Delaware corporation)	
JOHN BRANCA and JOHN MCCLAIN, Executors)	
of the Estate of Michael J. Jackson; MJJ)	
PRODUCTIONS, INC., a California corporation;)	
MUSION EVENTS LTD., a United Kingdom)	
private company; MUSION 3D LTD, a United)	
Kingdom private company; WILLIAM JAMES)	
ROCK, an individual; IAN CHRISTOPHER)	
O'CONNELL, an individual; and DOES 1 through)	
10,)	
Defendants.	

1 I, Ian Christopher O'Connell, pursuant to 28 U.S.C. § 1746, make the following
2 declaration:

3 1. My name is Ian Christopher O'Connell. I am a resident of London, England and a
4 citizen of the United Kingdom. I am over the age of twenty-one years and make this Declaration
5 based upon my personal knowledge.

6 2. I am a director of Musion Events Limited ("MEL") and Musion 3D Limited
7 ("M3D"). William James Rock, a co-defendant in this case, is a director of M3D but he is not a
8 director of MEL.

9 3. I have never been to Nevada on behalf of MEL or M3D and I was not present in
10 Las Vegas, Nevada for the Billboard Music Awards on May 18, 2014. I did not provide the
11 holographic projection system that was used in the Awards show, I did not help assemble the
12 system used in the Awards show, and I did not use the system during the Awards show. In fact, I
13 have only been to Nevada twice, once in 2009 and once in 2012, and both times I was there on
14 behalf of Musion Systems Limited prior to its insolvency. I have never been to Nevada in my
15 personal capacity or on behalf of MEL or M3D.

16 4. MEL and M3D did not have any employees, officers, or directors present in Las
17 Vegas, Nevada for the Billboard Music Awards on May 18, 2014, and MEL and M3D did not
18 assemble or help assemble the accused system. Moreover, MEL and M3D have never sent any
19 employees, officers, or directors to Nevada for any purpose whatsoever.

20 5. I do not do business in the State of Nevada, and am not required to be registered,
21 licensed or otherwise qualified to do business in Nevada. I have never been required to file any
22 type of tax return in Nevada. I have no employees, officers, or directors in Nevada. I do not own
23 or maintain any offices, assets, bank accounts, personal property, or real property in Nevada. I
24 am not required to, and do not, maintain a registered agent in Nevada.

25 6. I do not have, and have never had, any customers in Nevada. I do not advertise to
26 or target customers in Nevada, and do not derive, directly or otherwise, any revenue from the sale
27 of any products in Nevada or from goods, services or products consumed in Nevada. I have never
28 sold or shipped any products into the State of Nevada.

1 7. MEL does not do business in the State of Nevada, and is not required to be
2 registered, licensed or otherwise qualified to do business in Nevada. MEL has never been
3 required to file any type of tax return in Nevada. MEL has no employees, officers, or directors in
4 Nevada. MEL does not own or maintain any offices, assets, bank accounts, personal property or
5 real property in Nevada. MEL is not required to, and does not, maintain a registered agent in
6 Nevada. I understand that Plaintiffs have alleged that Mr. James Rock was present at the
7 Billboard Music Awards on May 18, 2014. However, Mr. Rock is not an employee, officer, or
8 director of MEL and Mr. Rock was not present at the Awards show on either MEL or M3D's
9 behalf. Mr. Rock did not receive compensation or remuneration of any kind from me, MEL or
10 M3D for his services during the Awards show.

11 8. MEL does not have, and has never had, any customers in Nevada. MEL does not
12 advertise to or target customers in Nevada, and does not derive, directly or otherwise, any
13 revenue from the sale of any products in Nevada or from goods, services or products consumed in
14 Nevada. MEL has never sold or shipped any products into the State of Nevada.

15 9. M3D does not do business in the State of Nevada, and is not required to be
16 registered, licensed or otherwise qualified to do business in Nevada. M3D has never been
17 required to file any type of tax return in Nevada. M3D has no employees, officers, or directors in
18 Nevada. M3D does not own or maintain any offices, assets, bank accounts, personal property, or
19 real property in Nevada. M3D is not required to, and does not, maintain a registered agent in
20 Nevada.

21 10. M3D does not have, and has never had, any customers in Nevada and does not
22 derive, directly or otherwise, any revenue from the sale of any products in Nevada or from goods,
23 services or products consumed in Nevada. M3D has never sold or shipped any products into the
24 State of Nevada.

25 11. M3D did supply two pieces of proprietary fireproof foil to co-defendant Pulse
26 Entertainment Corporation to determine if Pulse might have any interest in using that foil. The
27 foil pieces, however, were supplied to a third party called Background Images in Los Angeles,
28 California, not Nevada and the foil pieces were in fact never used during the Billboard Awards

1 show in Las Vegas.

2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct. Executed on February 12th, 2015 in London, England.

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6 IAN CHRISTOPHER O'CONNELL
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